# Commonwealth of Kentucky Division for Air Quality

## PERMIT APPLICATION SUMMARY FORM

Completed by: Massoud Kayvanjah

GENERAL INFORMATION:	
Name:	Berea College
Address:	Rustic Road, CPO 2211
	Berea, KY 40404
Date application received:	2/07/2008
SIC Code/SIC description:	8221, College
Source ID:	21-151-00006
Agency Interest:	39053
Activity:	APE20080001
Permit:	F-07-033 R1
APPLICATION TYPE/PERMIT ACTIVIT	<u>Y</u> :
[] Initial issuance	[ ] General permit
[ X ] Permit modification	[X] Conditional major
Administrative	[ ] Title V
_X_Minor	[ ] Synthetic minor
Significant	[ ] Operating
[X] Permit renewal formerly	Title V [ ] Construction/operating
COMPLIANCE SUMMARY:	
[ ] Source is out of compliant [X] Compliance certification	<u> •</u>
APPLICABLE REQUIREMENTS LIST:	
[ ] NSR	[X] NSPS [X] SIP
[ ] PSD	[ ] NESHAPS [ ] Other
[ ] Netted out of PSD/NSR	[ ] Not major modification per 401 KAR 51:001, 1(116)(b)
MISCELLANEOUS:	
[ ] Acid rain source	
[ ] Source subject to 112(r)	
	ally enforceable emissions cap for VOC
•	or alternative operating scenarios
[ ] Source subject to a MAC	
	y-case 112(g) or (j) determination
[ ] Application proposes nev	
[ ] Certified by responsible	
[ ] Diagrams or drawings in	
	formation (CBI) submitted in application
[ ] Pollution Prevention Mea	
[ ] Area is non-attainment (l	ist pollutants):

#### **EMISSIONS SUMMARY:**

Pollutant	Actual (tpy)	Potential (tpy)
PM/PM <sub>10</sub>	1.2	66.5
$SO_2$	0.06	8
NOx	11	28.5
СО	9.2	18.5
VOC	60.5	270.6
Single HAP	9	40
Source wide HAPs	14.4	65

#### MINOR PERMIT REVISION - F-07-033 R1

The Division received a minor modification from Berea College (Berea) on February 07, 2008, for the installation of three new natural gas fired boilers and two new natural gas fired hot water heaters. The boilers heat capacities are 1.36 MMBtu/hr (EU 09), 0.69 MMBtu/hr, and 0.55 MMBtu/hr, and the hot water heaters are rated at 0.199 MMBtu/hr each. The two existing boilers rated at 6.25 MMBtu/hr each (EU06-01 & EU06-02), will eventually be removed from the source after the new units are in operation. The new unit (EU09) is subject to the applicable state or federal regulations in the Conditional Major permit, and the source wide emissions cap will stay unchanged.

### **SOURCE DESCRIPTION:**

Berea College submitted a renewal and reclassification application to the Division on May 10, 2007, and supplemental information on June 07, 2007 and July 06, 2007, based on notice of deficiency issued on May 21, 2007. The facility currently operates under operating permit V-03-005 R2 that will expire on May 13, 2008. The reclassification is based on decommissioning and removal of two coal-fired units, EP-01 & EP-02 (rated at 107.7 and 71.8 MMBtu/hr) and two natural gas fired units EP-03 & EP-05 (rated at 52.4 and 50.0 MMBtu/hr). These eliminations have reduced the source wide emissions of all regulated air pollutants below the major source threshold; hence this permit is being issued as federally enforceable permit for non-major source (Conditional Major) instead of renewing the existing Title V permit. The facility is currently operating the two remaining large boilers 18 MMBtu/hr (EU08-01 & 02), each on natural gas with a back up fuel oil, two 6.25 MMBtu/hr (EU06-01 &02), one 1.26 MMBtu/hr (EU-07) and one 0.75 MMBtu/hr (Insignificant Activity NO. 23) all on natural gas. Basically, emission of regulated air pollutants from the boilers is below fifty tons per year; however, the paint booth has a utilization capacity of a major source to generate volatile organic compounds (VOC) above 100 tons per year. Considering the combined annual potential emissions of the heating system plus the rated potential of the furniture paint booth for VOC emissions (EU-04), Berea College has the potential to exceed major source thresholds for the VOC pollutants and HAPs. Therefore the facility has requested a source wide annual emissions limit for VOC, single HAP, combined HAPs to preclude the applicability of 40 CFR 63 Subpart JJ National Emission Standards for Wood Furniture Manufacturing Operations and 40 CFR 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial, Institutional Boilers and Process Heaters.

### **EMISSIONS AND OPERATING CAPS DESCRIPTIONS:**

Maximum annual source wide VOC emissions from the spray booth and the boilers shall not exceed 90 tons/year. Maximum single HAP (Toluene) emissions shall not exceed 9 tons per year and combined HAP shall not exceed 22.5 tons per year

## **OPERATIONAL FLEXIBILITY:**

None